UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

VICTORIA NYC I INC d/b/a RX2GO,

Case No.: 1:25-cv-975 (KAM) (MMH)

Plaintiff,

-against-

PLAINTIFF'S NOTICE OF **MOTION FOR DEFAULT** JUDGMENT AGAINST

DGN PHARMACY INC. d/b/a PERSONALRX, **DEFENDANT**

Defendant.

PLEASE TAKE NOTICE THAT, upon the annexed declaration of Andrei Rozenblyum,

Chief Operating Officer of Plaintiff Victoria NYC I Inc d/b/a Rx2Go ("Plaintiff"), and all prior papers and proceedings in this case, the Plaintiff, by its undersigned counsel, will move this Court, on such date as is set by the Court, pursuant to Rule 55(b)(2) of the Federal Rules of Civil Procedure and Local Civil Rule 55.2(b) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, for judgment by default against Defendant DGN Pharmacy Inc. d/b/a PersonalRx (hereinafter "Defendant").

PLEASE TAKE FURTHER NOTICE THAT, pursuant to Local Civil Rule 6.1(b), answering papers, if any, shall be served on the undersigned no later than Friday, August 29, 2025, and Plaintiff shall file reply papers in further support no later than Friday, September 5, 2025.

Dated: Jamaica, New York August 15, 2025

Respectfully submitted, SAGE LEGAL LLC

/s/ Emanuel Kataev, Esq. Emanuel Kataev, Esq. 18211 Jamaica Avenue Jamaica, NY 11423-2327 (718) 412-2421 (office) (917) 807-7819 (cellular) (718) 489-4155 (facsimile) emanuel@sagelegal.com Attorneys for Plaintiff Victoria NYC I Inc. d/b/a Rx2Go